



**UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
REGION 10**

1200 Sixth Avenue, Suite 900  
Seattle, WA 98101-3140

OFFICE OF  
ECOSYSTEMS, TRIBAL AND  
PUBLIC AFFAIRS

September 22, 2014

Heidi Whitlatch, RMP Project Manager  
2536 Kimberly Road  
Twin Falls, Idaho 83301

Re: U.S. Environmental Protection Agency (EPA) Comments on the Jarbidge Resource Management Plan (RMP) and Final Environmental Impact Statement (FEIS).  
EPA Project Number: 06-002-BLM

Dear Ms, Whitlatch:

The EPA has reviewed the Jarbidge RMP and FEIS, and we are submitting comments in accordance with our responsibilities under the National Environmental Policy Act (NEPA) and Section 309 of the Clean Air Act.

**Differences between the draft and final EIS' preferred alternatives**

In our January 2011 comments on the DEIS, we noted our belief that the EIS adequately set forth the environmental impacts of the preferred alternative and those of the alternatives reasonably available to the RMP. We also applauded the BLM for developing a preferred alternative which is superior to other alternatives with regard to many important environmental factors. We noted that not only is the DEIS' preferred alternative - Alternative IV - a substantial improvement over the no action alternative, it also ranks first of all the action alternatives with regard to:

- the attainment of State water quality standards,
- the attainment of riparian objectives,
- improving Fire Regime Condition Class,
- maintaining geologic features,
- reducing impacts to soil resources,
- control or eradication of noxious weeds and invasive plants,
- creating a landscape dominated by native communities in a variety of seral stages and the lowest proportion of uncharacteristic vegetation of all the alternatives,
- improving rangeland health within the Horse Management Area, and
- maintaining wilderness characteristics on non-WSA lands.

We are concerned that the FEIS's preferred alternative - Alternative VI - appears to offer a relatively lower level of environmental protection than the DEIS' preferred alternative. Instead of ranking first of all the action alternatives, the FEIS's preferred alternative ranks

- fifth for maintaining geologic features,

- fourth for reducing impacts to soil resources,
- fifth for amount of wildlife residual cover,
- fourth for management that maintains wilderness characteristics,
- fourth for decreasing motorized route density, and
- third for protecting Visual Resource Inventory Class II lands.

While several aspects of Alternative VI appear to be less environmentally protective, we recognize that other aspects offer the same or higher levels of protection. For example, Alternative VI has the greatest potential to achieve State water quality standards; the highest Properly Functioning Condition objective for water resources; supports retaining 99% of Visual Resource Inventory Class I lands; and would result in the second lowest amount of new roads and infrastructure in habitat for sage-grouse and other special status species in the sagebrush group. We also recognize that Alternative VI is estimated to increase employment in the cattle ranching and farming sector, while Alternative IV would lead to a decrease.

#### *Recommendation*

To address our concern about Alternative VI's relatively lower levels of environmental protection, we recommend that the Record of Decision's (ROD) Selected Alternative consider additional protections for geologic features, soil resources, wildlife residual cover, lands with wilderness characteristics, and Class II Visual Resource Inventory areas.

#### **Areas of Critical Environmental Concern (ACEC)**

In our comments on the DEIS we recommended that the BLM strongly consider committing to Alternative IV-A's ACEC designations. We recommended Alternative IV-A's ACEC designations because they would provide special management for 56% of lands with relevant and important values such as upland vegetation, redband trout, sage-grouse, spotted frog, slickspot peppergrass and water quality impaired streams. Alternative VI, in contrast, would provide special management through ACEC designation to 5% of lands with relevant and important values. While the Alternative VI represents a major decrease in the amount of lands containing relevant and important values, we agree that standard management actions associated with Special Status Species and Water Resources appear adequate.

#### *Recommendation*

To increase certainty that the Selected Alternative's ACEC designations and standard management actions will actually be adequate, we recommend that the ROD include clarifying information. Consider including in the ROD, a description, discussion or map supporting the assertion that Alternative VI's ACEC locations focus on priority relevant and important values.

#### **Minerals**

Your integration of several management measures from the EIS's Appendix D, the Aquatic and Riparian Management Strategy, into Chapter 2 of the EIS is responsive to our interest in additional information on how the RMP will ensure that Riparian Conservation Areas would be protected from mineral development. We expect the measures carried forward from DEIS Appendix D to FEIS Chapter 2, to be further carried forward into the ROD's Selected Alternative. We are especially supportive of RI-CA-MA-8 and RI-CA-MA-9 because they provide assurance that existing and new management activities and authorized uses will be

modified and conducted to achieve goals and objectives for riparian areas and wetlands, such as Properly Functioning Condition.

***Clarifying information recommendations***

Your responses in FEIS Appendix P address our DEIS comments on livestock grazing, financial assurance, monitoring and adaptive management and land use authorizations.

Thank you for this opportunity to comment, and if you have any questions or concerns please contact Erik Peterson of my staff at (206) 553-6382 or by electronic mail at [peterson.erik@epa.gov](mailto:peterson.erik@epa.gov). You may contact me at (206) 553-1601.

Sincerely,



Christine B. Reichgott, Manager  
Environmental Review and Sediment Management Unit